

October 28, 2024

**VIA ECF**

Hon. Katherine Polk Failla  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 618  
Southern District of New York  
New York, NY 10007

**MEMO ENDORSED**

Re: **Hansen v. Gerson Lehrman Group, Inc., 24 Civ. 2194**  
**Whelan, Jr., et al. v. Gerson Lehrman Group, Inc., 24 Civ. 2202**  
**Knapp v. Gerson Lehrman Group, Inc., 24 Civ. 2229**  
**Miller, et al v. Gerson Lehrman Group, Inc., 24 Civ. 2725**

Dear Judge Failla:

As Your Honor is aware, our firm represents Plaintiffs in this consolidated class action. We respectfully submit this consent motion pursuant to Your Honor's Individual Rules of Practice 2(C)(i) to respectfully request an additional fourteen-day extension of time to file the consolidated amended complaint in this matter and a thirty-day extension of time for Defendant to answer, move, or otherwise respond to the consolidated amended complaint. The Parties have reached a settlement, in principle, but need additional time to finalize the terms thereof.

On May 24, 2024, the Court entered an order consolidating four related actions and setting the deadline to file a consolidated amended class action complaint as June 28, 2024. Doc. 14. The order further set Defendant's deadline to answer, move, or otherwise respond to the consolidated amended complaint as August 16, 2024, noting that if Defendant filed a pre-motion letter, the Court would hold a pre-motion conference and set a briefing schedule at that time.

On July 30, 2024, Your Honor entered an order extending the time for Plaintiffs to file the consolidated amended complaint up to and including August 28, 2024, and for Defendant to answer, move or otherwise respond to same up to and including October 16, 2024. Dkt. 21. Subsequent extensions have been granted, with the most recent being the thirty-day extension requested and granted by Your Honor on September 27, 2024 (*see* Docs. 23 and 24), making Plaintiffs current deadline to file the consolidated amended complaint October 28, 2024.

Plaintiffs now seek a fourteen-day extension of time to file the consolidated class action complaint, to November 11, 2024, to allow them to memorialize the settlement they have

tentatively reached. Plaintiffs further request a thirty-day extension of time for the deadline for Defendant to answer, move, or otherwise respond to the consolidated amended complaint to be extended to January 15, 2025. This is the fifth request for an extension of these deadlines and Defendant is unopposed to this request.

Should Your Honor have any questions or require additional information, please feel free to contact Plaintiffs' counsel.

Sincerely,

/s/ Mason A. Barney

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Attorney for Plaintiffs

cc: All counsel of record via ECF

Application GRANTED. Plaintiffs shall file their consolidated amended complaint on or before **November 11, 2024**. Defendants shall answer, move, or otherwise respond to the consolidated amended complaint on or before **January 15, 2025**.

Furthermore, in light of the parties' representation that they have reached a settlement in principle in this case, the initial pretrial conference currently scheduled for January 10, 2025, is hereby ADJOURNED *sine die*, pending further order of the Court, which will reschedule the conference (as needed) once Defendants have responded to the consolidated amended complaint.

The Clerk of Court is directed to terminate the pending motion at docket entry 25.

Dated: October 29, 2024  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE 2